

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ADOLFO BAUTISTA HERRERA,

Plaintiff,

v.

GRAND SPORTS ARENA, LLC, D/B/A  
CHICAGO MUSTANGS PRO, MASL  
SOCCER, LLC D/B/A MAJOR ARENA  
SOCCER LEAGUE AND/OR MASL  
SOCCER PRO, XOCHITL MEZA, and  
ARMANDO GAMBOA, individually,

Defendants.

Case No. 17-CV-00452

**Judge: Robert M. Dow, Jr.**

Magistrate Judge: M. David Weisman

**PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT**

Plaintiff, Adolfo Bautista Herrera ("Bautista"), by and through his attorneys, Caffarelli & Associates, Ltd., moves this Honorable Court for entry of judgment against Defendants Grand Sports Arena, LLC, d/b/a Chicago Mustangs Pro, Xochitl Meza, individually, and Armando Gamboa, individually, pursuant to the Acceptance of Offer of Judgment filed on March 9, 2018, D.E. 54. In support of his motion, Plaintiff states as follows:

1. On March 5, 2018, Defendants Grand Sports Arena, LLC, d/b/a Chicago Mustangs Pro ("GSA"), Xochitl Meza ("Meza"), individually, and Armando Gamboa ("Gamboa"), individually, served Plaintiff with an Offer of Judgment pursuant to Rule 68 of the Federal Rules of Civil Procedure, attached hereto as Exhibit A.

2. On March 9, 2018, Plaintiff accepted the Offer of Judgment and pursuant to Rule 68(a) of the Federal Rules of Civil Procedure accepted in writing and filed the Acceptance of Offer of Judgment, D.E. 54.

3. Pursuant to Rule 68(a), Plaintiff moves the Court to enter judgment in the amount of \$37,600 jointly and severally against Defendants GSA, Meza, and Gamboa. Plaintiff also

moves the Court for leave to file a petition for attorneys' fees, costs, and interest pursuant to the Offer of Judgment and the Illinois Wage Payment and Collection Act, 820 ILCS 115/14(a) ("In a civil action, such employee shall also recover costs and all reasonable attorney's fees.").

WHEREFORE, Plaintiff, Adolfo Bautista Herrera, respectfully requests that this Honorable Court enter judgment against Defendants Grand Sports Arena, LLC, d/b/a Chicago Mustangs Pro, Xochitl Meza, individually, and Armando Gamboa, individually, jointly and severally, in the amount of \$37,600, as well as an Order granting leave to file a petition for attorneys' fees, costs, and prejudgment interest pursuant to the Offer of Judgment and Illinois Wage Payment and Collection Act,

Dated: March 22, 2018

Alejandro Caffarelli, #06239078  
Alexis D. Martin, #06309619  
Caffarelli & Associates Ltd.  
224 South Michigan Avenue, Suite 300  
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Tel. (312) 763-6880

Respectfully submitted,  
ADOLFO BAUTISTA HERRERA

By: /s/ Alejandro Caffarelli  
One of Plaintiff's attorneys

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that he caused a copy of the attached, **Plaintiff's Motion for Entry of Judgment**, to be served upon the party below by electronically filing with the Clerk of the U.S. District Court of the Northern District of Illinois on March 22, 2018.

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/s/ Alejandro Caffarelli  
Attorney for Plaintiff